

## Privacy Notice

The practice aims to meet the requirements of the Data Protection Act 2018, the General Data Protection Regulation (GDPR), the guidelines on the Information Commissioner's website, as well as our professional guidelines and requirements.

The data controller is Shaunak Popat Orthodontics Ltd T/A Angle House Orthodontics Cricklewood. The information governance lead and the Data Protection Officer is Shaunak Popat.

This Privacy Notice is available on the practice website at <https://anglehouse.com/legal-policy/privacy-policy/>, at reception or by email if you contact [cricklewood.office@anglehouse.com](mailto:cricklewood.office@anglehouse.com).

You will be asked to provide personal information when joining the practice. The purpose of processing your personal data is to provide you with optimum dental health care and prevention.

The categories and examples of data we process are:

- Personal data for the provision of dental health care
- Personal data for the purposes of providing treatment plans, recall appointments, reminders or estimates
- Personal data such as details of family members for the provision of health care to children or for emergency contact details
- Personal data for the purposes of employed and self-employed team members employment and engagement, respectively
- Personal data for the purposes of direct mail/email/text/ to inform you of important announcements or about new treatments or services
- Personal data - IP addresses so that we can understand our patients better and inform our marketing approach as well as improve the web site experience
- Special category data including health records for the purposes of the delivery of health care and meeting our legal obligations
- Special category data including health records
- Special category data to meet the requirements of the Equality Act 2010
- Special category data details of criminal record checks for employees and contracted team members

We minimise the data we keep and do not keep it for longer than necessary.

We never pass your personal details to a third party unless we have a contract for them to process data on our behalf and will otherwise keep it confidential. If we intend to refer a patient to another practitioner or secondary care such as a hospital, we will gain the individual's permission before the referral is made and the personal data is shared. Your data will be shared with the NHS in England if you are having NHS treatment.

- Personal data is stored in the UK or EU whether in digital or hard copy format
- Personal data is stored outside of the UK and/or EU in digital format when suitable safeguards have been put in place to allow personal data to be transferred
- Personal data is obtained when a patient joins the practice, when a patient is referred to the practice and when a patient subscribes to an email list / other

For full details or where your data is stored, please ask to see Information Governance Procedures.

We have established the following lawful bases for processing your data:

Our lawful bases for processing personal data:

- The legitimate interests of the dental practice
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
- Processing is necessary for the establishment, exercise or defence of legal claims
- Consent of the data subject
- To comply with our legal obligations

Our Article 9 conditions for processing special category data:

- Processing is necessary for health care purposes
- Processing necessary for identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people with the view to enabling such equality to be promoted or maintained
- We obtain consent of the data subject to process criminal record checks
- Processing is necessary for a legal defence

The reasons we process the data include:

- To maintain your contemporaneous clinical records
- To provide you with dental treatment, prevention and oral health advice
- To carry out financial transactions with you
- To manage your NHS dental care treatment
- To send your personal data to the General Dental Council or other authority as required by law
- To communicate with you as and when required, including appointment reminders, treatment plans, estimates and other communications about your treatment or the practice
- To communicate with your next of kin in an emergency
- If a parent or carer to communicate with you about the person you parent or care for
- To refer you to other dentists or doctors and health professionals as required
- To obtain criminal record disclosures for team members
- For debt recovery
- To continually improve the care and service you receive from us

The personal data we process includes:

Your name, address, gender, date of birth, NHS number, medical history, dental history, family medical history, family contact details, marital status, financial details for processing payment, your doctor's details and details of treatment at the practice. We may process more sensitive special category data, including ethnicity, race, religion, or sexual orientation so that we can meet our obligations under the Equality Act 2010, or for example, to modify treatment to suit your religion and to meet NHS obligations.

The retention period for special data in patient records is a minimum of 11 years and maybe longer for complex records or to meet our legal requirements. The retention period for other personal data is two years after it was last processed. Details of retention periods are available in the Record Retention procedure available from the practice.

We obtain your personal details when you enquire about our care and service, when you join the practice, when you subscribe to our newsletter or register online, when you complete a registration or medical history

form and when another practitioner refers you for treatment at our practice. Occasionally patients are referred to us from other official sources such as NHS clinics or hospitals.

You have the following personal data rights:

- The right to be informed about the collection and use of your personal data
- The right of access – to have a copy of the data we hold about you. We may charge you for this service
- The right to rectification - to correct the data we have if it is inaccurate or incomplete
- The right to deletion of your personal data (clinical records must be retained for a certain period)
- The right to restrict processing of your personal data
- The right to data portability – to have your data transferred to someone else
- The right to object to the processing of your personal data
- Rights in relation to automated decision making and profiling

Further details of these rights can be seen in our Information Governance Procedures or at the [Information Commissioner's website](#). Here are some practical examples of your rights:

- If you **are** a patient of the practice, you have the right to withdraw consent for important notifications, newsletters, surveys or marketing. You can inform us to correct errors in your personal details or withdraw consent from communication methods such as telephone, email or text. You have the right to obtain a free copy of your patient records within one month
- If you are **not** a patient of the practice, you have the right to withdraw consent for processing personal data, have a free copy of it within one month, correct errors in it, or ask us to delete it. You can also withdraw consent from communication methods such as telephone, email or text

We have carried out a Privacy Impact Assessment in Sensitive Information Map, PIA and Risk Assessment (M 217Q) and you can request a copy from the details below. The details of how we ensure security of personal data is in our Security Risk Assessment (M 217M) and Information Governance Procedures (M 217C).

#### **Comments, suggestions and complaints**

Please contact the IG Lead at the practice for a comment, suggestion or a complaint about your data processing at [cricklewood.office@anglehouse.com](mailto:cricklewood.office@anglehouse.com) or 0203 143 1300 or by writing to or visiting the practice at Angle House Orthodontics Cricklewood, Unit 3, 120 Cricklewood Lane, Cricklewood, London, NW2 2DP. We take complaints very seriously.

If you are unhappy with our response or if you need any advice, you should contact the Information Commissioner's Office (ICO). Their telephone number is 0303 123 1113; you can also [chat online with an advisor](#). The ICO can investigate your claim and take action against anyone who's misused personal data. You can also visit their website for information on [how to make a data protection complaint](#).

#### **Related practice procedures**

You can also use these contact details to request copies of the following practice policies or procedures:

- Data Protection and Information Security Policy, Consent Policy
- Sensitive Information Map, PIA and Risk Assessment, Information Governance Procedures, Record Retention

If you have an enquiry or a request, please contact the Information Governance the Practice Manager or the Practice Partner.

Address: Angle House Orthodontics Cricklewood, Unit 3, 120 Cricklewood Lane, Cricklewood, London, NW2 2DP

Email: [cricklewood.office@anglehouse.com](mailto:cricklewood.office@anglehouse.com)

Phone: 0203 143 1300

## **Privacy Notice for Children**

The practice keeps records of your name, address, date of birth and details of any health problems as well as details of your dental treatment and details about your family. We keep this information so that we can provide you with the best dental care. Your personal information is kept very confidentially and securely.

We only use your personal information so we can give you the best dental care and for sending reminders to you.

We only pass your personal information to another dentist, doctor or hospital if you have a problem that needs their special skills and you need to go and see them. We will not give your information to anyone else unless the law allows us to or we have to provide it for legal reasons.

If you leave the practice, we will stop using your information, but will keep it confidentially and securely until you are 25 years old (or 26 years old if you were 17 when your last treatment ended), or for 15 years (NHS patient)/11 years (private patient) after the completion of treatment, whichever is longer.

We will then review if and when we can delete it. You can always ask for a copy of the information we hold for you, we can transfer it to another dentist or doctor at your request and you can ask us to stop using your personal information to send letters or contact you in other ways if you are no longer a patient at the practice.

When you reach 18 years of age the Privacy Notice about how we process your personal information will change to the adult version. This can be found on our website.

If you would like a copy of the information we hold about you or if you have any other enquiries it about such as to change an error in your information or to provide a copy of your information to somebody else please contact: the Information Governance Lead - The Practice Manager or the Practice Partner.

## **Data Opt-Out Policy (England)**

### **How the NHS and care services use your information**

Angle House Orthodontics Cricklewood is one of many organisations working in the health and care system to improve care for patients and the public. Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment. The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance, to help with:

- Improving the quality and standards of care provided
- Research into the development of new treatments
- Preventing illness and diseases
- Monitoring safety
- Planning services

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is **only used** like this where allowed by law.

Most of the time, anonymised data is used for research and planning so that you cannot be identified, in which case your confidential patient information isn't needed.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information, you do not need to do anything. If you choose to opt-out, your confidential patient information will still be used to support your individual care. To find out more or register your choice to opt-out, please visit [www.nhs.uk/your-nhs-data-matters](http://www.nhs.uk/your-nhs-data-matters). On this web page, you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

You can also find out more about how patient information is used at:

<https://www.hra.nhs.uk/information-about-patients/> (which covers health and care research); and <https://understandingpatientdata.org.uk/what-you-need-know> (which covers how and why patient information is used, the safeguards and how decisions are made)

You can change your mind about your choice at any time.

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes, and data would only be used in this way with your specific agreement.

NHS Health and care organisations must have systems and processes in place so they can be compliant with the national data opt-out and apply your choice to any confidential patient information they use or share for purposes beyond your individual care.

Our practice only uses your personal health data to provide individualised care to you and does not disclose your data for any other purposes. The national data opt-out does not apply to our usage of your data, and we are compliant with the policy.